<center>**Remark**</center>

Applicants respectfully request reconsideration of this application as amended. Claims 5, 14, 26, 27, 28 and 30 have been amended. Claims 4, 12, 18, 23 and 29 have been cancelled. Therefore, claims 1-3, 5-11, 13-17, 19-22, 24-28 and 30 are present for examination.

<center>**35 U.S.C. §101 Rejection**</center>

The Examiner has rejected claims 5-6 and 20-24 under 35 U.S.C. 101 as not directed to non-statutory subject matter. The claim is amended to add "non-transitory" as suggested by the Examiner.

<center>**35 U.S.C. §112 Rejection**</center>

The Examiner has rejected claims 25-28 under 35 U.S.C. §112, second paragraph, for lack or antecedent basis for "tuner." These claims are amended to refer to the "receiver."

<center>**35 U.S.C. §103 Rejection**</center>

<center>*Chang, Agnihotri and Molaro*</center>

The Examiner has rejected claims 1-3, 5-11, 13-17, 19-22, 24-28 and 30 under 35 U.S.C. §103(a) as being unpatentable over Chang US Patent No. 5,543,851 ("Chang"), in view of Agnihotri, WO No. 03/030018 ("Agnihotri") and in further view of Molaro US Patent Publication No. 2006/0262219 ("Molaro").

Chang shows a system which decodes closed caption text and presents it on an auxiliary display. Chang shows a translated character in Figures 5c, 7a, and 7b, however there is no description of how these are generated.

Agnihotri shows a system which decodes closed caption text, translates the text and presents it on the same display with the video. Agnihotri provides no clear disclosure of how the translated text data is displayed. At page 6, lines 27-30, "the translated text data 46 is then formatted and correlated to the related video and sent to a display 40 along with the video component 18 of the originally received signal to be displayed simultaneously with the corresponding video..." Lines 18 and 46 are shown as separate lines so that it would appear that the text data is sent separately and then somehow combined onto the screen at the display 40. While Agnihotri shows the translation of encoded text, it provides no clear teaching on how to combine the translated text back with the video.

Chang has the obvious problem of using two screens with the additional cost and the distance between the text and the video. Agnihotri has the problem of how to present the text and video on the same screen. The presentation of the text with the video as part of the video as claimed in the present invention presents a significant advance over the prior art because the resulting video signal can be displayed on a standard television set. The text display is not limited to the allowed languages and character sets of the standards for encoded text. Nor is a special television required since the translated text is superimposed over images of the video signal.

Neither of the two references has solved these problems.

The Examiner cites Molaro to show "superimposing the closed captioning onto the video images, using alpha blending techniques such that the closed captioning is part of the video images."

Molaro is not interested in translating the CC text but in changing how the text is presented. In order to move the text to a different position as shown in Figure 3, 220, 240 and add balloons and arrows 230, 250, the text must be taken out of the CC decoding system and rendered in some other way.

A.   There is no motivation to combine

The Examiner states that it would be obvious to display CC text using alpha blending techniques in order to minimize the obstructions to the video and make the dialog easier to follow. (Quoted by the Examiner from Molaro para. 21.) However, these are advantages cited by Malaro, not necessarily advantages provided by the claimed invention. The claimed invention does not necessarily move the translated text to minimize obstruction and to identify the speaker. Accordingly, the Examiner has not provided a motivation to apply the teachings of Molaro to Chang and Agnihotri to achieve the present invention.

B.   Molaro does not solve the problems addressed by the claimed invention

Molaro does not allow for extra languages and characters not supported by CC text to be shown on a television without a CC text decoder. Molaro does not suggest any change to the text at all except to change its position. A person of average skill faced with the problems of rendering additional languages and characters would not think to use the technique of Molaro which shows how to move the position of the text.

For these reasons Applicants respectfully submit that the claimed invention is not obvious over the combination of three references.

Conclusion

Applicants respectfully submit that the rejections have been overcome by the amendment and remark, and that the claims as amended are now in condition for allowance. Accordingly, Applicants respectfully request the rejections be withdrawn and the claims as amended be allowed.

Invitation for a Telephone Interview

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.
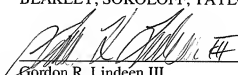
Request for an Extension of Time

Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: <u>December 28, 2011</u>

Gordon R. Lindeen III
Reg. No. 33,192

1279 Oakmead Parkway
Sunnyvale, California 94085
(303) 740-1980